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July 25, 2008

VIA TELEFAX

Honorable Loretta A. Preska
United States District Judge
Daniel Patrick Moynihan
United States Court House
500 Pearl Street, Room 1320
New York, NY 10007

**Green S. A. v. Bin Johar General Trading LLC, aka Bin Johar
Trading LLC and Cavalier Enterprise, Inc.**
07 Civ. 5591 (LAP)

Dear Judge Preska:

I am the attorney for defendant Cavalier Enterprise Inc. in the counterclaim in this Rule B attachment action and respectfully submit this joint letter on behalf of all counsel in this matter.

Counsel have conferred and agreed subject to your approval that the following discovery schedules endorsed by your Honor on February 14, 2008 be extended as follows:

All fact discovery, (original date July 30, 2008) to be completed no later than September 30, 2008.

Interrogatories, (original date, April 22, 2008) to be served by September 1, 2008.

Depositions, (original date June 4, 2008) to be completed by September 30, 2008.

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Requests to Admit, (original date June 25, 2008) to be served no later than October 21, 2008.

Requests for a pre-motion conference as to dispositive motions shall be made no later than November 15, 2008 with responses
Dispositive motions, (original date August 11, 2008) to be served no later than December 11, 2008, with opposition papers, (original date August 21, 2008) to be served no later than December 22, 2008, and reply papers, (original date August 28, 2008) to be served no later than December 29, 2008. *within five business days.*

No prior requests for adjournments or extensions of time have been made.

We thank you for your attention to this matter.

Respectfully yours,

J. David O'Brien
J. David O'Brien

BY TELEFAX

Cc: Jon Werner, Esq.

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So ordered

Louetta A. Preska

USDC

August 4, 2008